

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Kristen Leet,

Plaintiff,

v.

Enhanced Recovery Company, LLC  
c/o LexisNexis Document Solutions  
801 Adlai Stevenson Drive  
Springfield, IL 62703,

Defendant.

Case No.

**COMPLAINT**

**Jury Demand Requested**

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**JURISDICTION AND VENUE**

- 1- This court has jurisdiction pursuant to 28 U.S.C. §§1331, 1337, 1367; and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

**PARTIES**

- 3- Plaintiff incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
- 4- Plaintiff is a resident of the State of Indiana.
- 5- Defendant is a corporation with its principal office in the State of Delaware.
- 6- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 7- Defendant regularly attempts to collect, or attempts to collect, debts owed or due to another.
- 8- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.

**FACTS COMMON TO ALL COUNTS**

- 9- On or around February 16, 2012, Plaintiff filed a voluntary bankruptcy petition (õPetitionö) that included the Debt.
- 10- On or around March 9, 2012, Defendant sent Plaintiff a letter to collect the Debt.
- 11- At the time of these communications, Defendant knew or should have known about the Petition.
- 12- Defendant damaged Plaintiff.
- 13- Defendant violated the FDCPA.

**COUNT I**

- 14- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 15- Defendant violated 15 USC §1692c(a)(2) by communicating with a consumer after having notice that the consumer was represented by an attorney.

**COUNT II**

- 16- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 17- Defendant violated 15 USC § 1692e(2) by misrepresenting the character, amount, and/or legal status of the Debt.

**COUNT III**

- 18- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.
- 19- Defendant violated 15 USC § 1692f by engaging in unfair and/or unconscionable means to collect, or attempt to collect, the Debt.

**COUNT IV**

- 20- Plaintiff incorporates all the allegations and statements made above as if reiterated herein.

21- Defendant violated 15 USC § 1692e by engaging in false, deceptive, or misleading methods to collect a debt.

**JURY DEMAND**

22- Plaintiff demands a trial by jury.

**PRAYER FOR RELIEF**

23- Plaintiff prays for the following relief:

- a. Judgment against Defendant for Plaintiff's actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$1,000 in statutory damages for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiff's reasonable attorneys' fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

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